

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Bryan P. Couch
Connell Foley LLP
85 Livingston Avenue
Roseland, New Jersey 07068
(973) 535-0500
Attorneys for Plaintiff, Days Inns Worldwide, Inc.

DAYS INNS WORLDWIDE, INC., a
Delaware Corporation, f/k/a DAYS INNS OF
AMERICA, INC.,

Plaintiff,

v.

KRISHAN CORPORATION, a California
Corporation; and PANKAJ K. PATEL, an
individual,

Defendants.

Civil Action No. 07cv4753(PKC)

**NOTICE OF MOTION FOR DEFAULT
JUDGMENT**

TO: Pankaj K. Patel
2460 Fontaine Road
San Jose, CA 95121


Krishan Corporation
2460 Fontaine Road
San Jose, CA 95121

PLEASE TAKE NOTICE that upon the annexed affirmation of Robert Spence, affirmed on October 24, 2007, and upon the exhibits attached thereto; and upon the annexed affirmation of Bryan P. Couch, Esq., affirmed on October 25, 2007, and upon the exhibits attached thereto; and upon the pleadings herein, the undersigned, attorneys for plaintiff, Days Inns Worldwide, Inc. ("DIW"), will move before this Court, before the Honorable P. Kevin Castel, U.S.D.J., at the United States District Court for the Southern District of New York, U.S. Courthouse, Room 2260, 500 Pearl Street, New York, New York, for an Order pursuant to Rule

55.2(a) of the Federal Rules of Civil Procedure granting final judgment by default against defendants Krishan Corporation and Pankaj K. Patel.

I declare under penalty of perjury that the foregoing is true and correct.

CONNELL FOLEY LLP
Attorneys for Plaintiff,
Days Inns Worldwide, Inc.

By: _____
Bryan P. Couch

Dated: October 25, 2007

CERTIFICATION OF FILING

I hereby certify that on this date the within Notice of Motion and supporting papers were filed with the Clerk, United States District Court for the Southern District of New York, by sending same via email.



Bryan P. Couch

Dated: October 25, 2007

CERTIFICATION OF SERVICE

I hereby certify that on this date a true copy of the within Notice of Motion and all supporting papers were served on the defendants by sending the same via certified and regular mail, addressed as follows:

Pankaj K. Patel
2460 Fontaine Road
San Jose, CA 95121

Krishan Corporation
2460 Fontaine Road
San Jose, CA 95121



Bryan P. Couch

Dated: October 25, 2007